

# EXHIBIT B

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP,

*Defendant.*

No. 22 Civ. 10016 (LAK)

**PLAINTIFF E. JEAN CARROLL'S RULE 26(a)(1) INITIAL DISCLOSURES**

Plaintiff E. Jean Carroll, by and through her undersigned counsel, hereby makes the following initial disclosures to Defendant in the above-captioned matters as required by Fed. R. Civ. P. 26(a)(1).

Nothing in these initial disclosures constitutes, or is intended to constitute, a waiver of any claim, right, or defense in this case or otherwise. Plaintiff continues to investigate matters related to the litigation, may become aware of additional information through discovery or otherwise, and may become aware of new reasons why information presently known may be relevant to this action. Moreover, the issues raised in this matter may require analysis by retained experts. Plaintiff reserves the right to supplement, revise, and/or correct these initial disclosures. In addition, Plaintiff expressly reserves all applicable privileges, including without limitation the attorney-client privilege and the work-product doctrine, and Plaintiff makes these disclosures subject to those privileges and immunities. Plaintiff further makes these disclosures subject to the discovery confidentiality order the Court has entered in this case.

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## DISCLOSURES

- 1. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i), based on her current knowledge, information, and belief and subject to further investigation, discovery, and analysis by experts, Plaintiff discloses the following individuals likely to have discoverable information that may be used to support Plaintiff's claims or defenses, other than the parties themselves. Plaintiff reserves the right to amend or supplement these disclosures, including as provided by Fed. R. Civ. P. 26(e). The following disclosures do not include persons whose testimony is likely to be used solely for impeachment, rebuttal, or expert witness testimony, who will be disclosed in accordance with the schedule set by the Court. Based on her current knowledge, information, and belief, and subject to further investigation, discovery, and analysis by experts, Plaintiff states that there are likely millions of people in the United States and across the world who witnessed Defendant's defamatory act on October 12, 2022. Plaintiff further states that the following individuals are likely to have discoverable information that may be used to support her claims, in addition to the parties themselves:

Name	Contact Information	Subjects
Lisa Birnbach	c/o Andrew Celli Emery Celli Brinckerhoff Abady Ward & Maaxel LLP 600 Fifth Avenue at Rockefeller Center New York, NY 10020 (212) 763-5000 acelli@ecbawm.com	Carroll's contemporaneous account of the underlying assault

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Name	Contact Information	Subjects
Carol Martin	c/o Noam Biale Sher Tremonte LLP 90 Broad Street 23rd Floor New York, NY 10004 (212) 300-2455 nbiale@shertremonte.com	Carroll's contemporaneous account of the underlying assault
Cande Carroll	c/o Sidhardha Kamaraju Pryor Cashman LLP 7 Times Square 40 <sup>th</sup> Floor New York, NY 10036 (212) 326-0895 skamaraju@pryorcashman.com	The timing of Carroll's coming forward and damages
Jessica Leeds	c/o Anne Champion Gibson Dunn & Crutcher LLP 200 Park Ave New York, NY 10166-0193 (212) 351-5361 achampion@gibsondunn.com	Account of her own assault by Defendant
Robbie Myers	c/o Kathleen Cassidy Morvillo Abramowitz Grand Iason & Anello PC 565 Fifth Avenue New York, NY 10017 (212) 880-9413 kcassidy@maglaw.com	Carroll's journalism career
Natasha Stoynoff	c/o Anne Champion Gibson Dunn & Crutcher LLP 200 Park Ave New York, NY 10166-0193 (212) 351-5361 achampion@gibsondunn.com	Account of her own assault by Defendant

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Name	Contact Information	Subjects
Stephanie Grisham	c/o Adam VanHo VanHo Law 243 Furnace Street Suite 201 Akron, Ohio 44304 (333) 653-8511 adam@vanholaw.com	Defendant's statements about Carroll
Cheryl Lee Beall	Cheryl Lee Beall [REDACTED]	The Bergdorf Goodman department store in the relevant period, including the operations and layout of the store, and Defendant's presence in the store
Robert Salerno	Robert Salerno [REDACTED]	The Bergdorf Goodman department store in the relevant period, including the operations and layout of the store, and Defendant's presence in the store

Expert disclosures will be made in accordance with the Court's Pretrial and Scheduling Order and Fed. R. Civ. P. 26(b)(2). Plaintiff reserves the right to use the testimony of other witnesses whose identity may be subsequently learned through discovery or other means.

2. **A copy, or a description by category and location, of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii), based on current knowledge, and subject to further investigation, discovery, and analysis by experts, Plaintiff hereby discloses the following categories of documents and things in her possession, custody or control that she may use to support her claims. Plaintiff reserves the right to amend or supplement these disclosures, including

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as provided under Fed. R. Civ. P. 26(e). The following disclosures do not include documents and things that are likely to be offered solely for impeachment:

1. Material in the discovery record in *Carroll v. Trump*, No. 20 Civ. 7311 (LAK) (“*Carroll I*”), consistent with the Court’s Pretrial and Scheduling Order in this Action. *See* ECF 19 at 1.
2. Defendant’s statements identified or referred to in Paragraphs 10, 82-85, 91-99 of the Complaint in this Action, which also encompass the statements identified or referred to in the Complaint in *Carroll I*.
3. Other publications, public statements, and content created by Defendant.
4. Proof of damages.

**3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

Plaintiff has sustained damages in an amount to be determined at trial, which includes, without limitation, damages to her reputation and future career prospects, emotional and psychological damages, and loss of consortium, plus prejudgment interest, attorneys’ fees, expenses, costs and disbursements. Plaintiff has retained the services of experts to opine on the Plaintiff’s damages, for which disclosures will be made in accordance with the Court’s Pretrial and Scheduling Order and Fed. R. Civ. P. 26(b)(2). Plaintiff reserves the right to modify this calculation of damages accordingly.

**4. Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in the action to indemnify or reimburse for payments made to satisfy the judgment.**

None applicable.

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**THE INSTANT DISCLOSURE IS WITHOUT PREJUDICE TO AND WITH A  
RESERVATION OF ALL RIGHTS TO SUPPLEMENT OR AMEND PLAINTIFF'S  
DISCLOSURE.**

Dated: New York, New York  
January 9, 2023



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